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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	Case No.: 09-50026 (REG)
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	(Jointly Administered)
Debtors	:	
-----X	:	

**CREDITOR HAROLD MARTIN'S REPLY TO
DEBTORS' NINTH OMNIBUS OBJECTION TO CLAIMS**

Creditor Harold E. Martin respectfully hereby replies to Debtors' Ninth Omnibus
Objection to Claims (Claims with Insufficient Documentation) and states as follows:

ARGUMENT

1. On June 1, 2009, Debtors Motor Liquidation Company (f/k/a General Motors Corporation) ("General Motors"), Case No. 09-50026, MLCS, LLC (f/k/a Saturn, LLC), Case No. 09-50028, and MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc., Case No. 09-13558, and on October 9, 2009, two additional Debtors, Remediation and Liability Management Company, Inc., Case No. 09-50029 (collectively, the "Initial Debtors"), and Environmental Corporate Remediation Company, Inc., Case No. 09-

50030, each filed for bankruptcy protection under chapter 11 of the Bankruptcy Code.

These cases are being jointly administered under Case No. 09-50026.

2. On September 16, 2009, this Court entered the Bar Date Order establishing November 30, 2009, as the deadline for each person or entity to file a proof of claim in Initial Debtor's cases.

3. On October 6, 2009, this Court entered an order approving procedures for the filing of omnibus objections to proofs of claim filed in chapter 11 cases [Docket No. 4079] (the "Procedures Order"). The Procedures Order authorizes the Initial Debtors, among other things, to file omnibus objections to no more than 100 claims at a time, on various grounds, including those set forth in Bankruptcy Rule 3007 and those additional grounds set forth in the Procedures Order.

4. On January 7, 2010, Debtors filed their Ninth Omnibus Objection to Claims (the "Ninth Omnibus Objection"), which includes the proof of claim filed *pro se* by Mr. Martin on or about November 18, 2009 [Claim No. 29732] (the "Martin POC #1").

5. Mr. Martin is a sixty-seven year old. He is a former employee of Debtor Motor Liquidation Company (f/k/a General Motors Corporation) ("General Motors"), who worked in General Motors' Truck and Bus Division in Baltimore, Maryland. On or about July 31, 2002, Mr. Martin was in a work related accident that caused him to suffer permanent and partial injuries to his right leg and left shoulder. These injuries required, among other things, a knee replacement. Shortly after his accident, Mr. Martin filed a workers' compensation claim with the Maryland Workers' Compensation Commission ("MWCC"), who found in his favor.

6. There can be little dispute that Mr. Martin has a legitimate claim against Debtor General Motors and that he filed a timely proof of claim in this case *pro se* on or about November 18, 2009 [Claim No. 29732] (the “Martin POC #1”).¹ Debtors do not dispute either of these facts. Rather, they have filed a general objection to the sufficiency of the documentation contained in Martin POC #1. Attached hereto as Exhibit A are copies of Mr. Martin’s records from the MWCC’s website that more than sufficiently documents Mr. Martin’s claims in this case. Moreover, if Debtors identify additional documentation they would like to see, Mr. Martin will attempt to provide it.

7. In sum, Mr. Martin has a legitimate workers’ compensation claim against Debtor General Motors. Attached to the Reply is additional documentation that evidences that claim, which this Court should deem more than sufficient to evidence his claim and satisfy the requirements of this Court and Bankruptcy Rule 3007. Moreover, justice and fairness fully support this Court overruling Debtors’ objection to Mr. Martin’s claim in this case.

¹ Debtors’ records indicate that Mr. Martin filed two virtually identical proofs of claim. Mr. Martin has no objection to his second proof of claim filed on or about November 20, 2009 [Claim No. 33009] being stricken as a duplicate claim.

CONCLUSION

WHEREFORE, for the reasons stated herein, Creditor Harold Martin respectfully requests that Debtors Ninth Omnibus Objection to Claims be overruled as it relates to Martin POC #1 in this case [Claim No. 29732].

Respectfully submitted,

/s/ Jan I. Berlage

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of February, 2010 a copy of Creditor Harold Martin's Objection to Notice of Debtor's Ninth Omnibus Objection to Claims was served via electronically to the following:

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/s/ Jan I. Berlage
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